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7 *Attorneys for Defendant*  
Patagonia, Inc.

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10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE DISTRICT OF ARIZONA

12 Heather Knight

13 Plaintiff,

14 v.

15 Patagonia, Incorporated,  
16 Defendant.  
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No. CV-24-00255-TUC-RM

*Assigned to the Hon. Rosemary  
Marquez*

**DECLARATION OF JESSICA  
DAHLSTRUM IN SUPPORT OF  
DEFENDANT PATAGONIA, INC.'S  
MOTION TO DISMISS**

**DECLARATION OF JESSICA DAHLSTRUM**

I, Jessica Dahlstrum, declare as follows:

1. I am currently Director of Digital Media Marketing for Patagonia, Incorporated ("Patagonia"). I have personal knowledge of the facts set forth herein, which are known by me to be true and correct, or I have confirmed those facts based on my review of business records made available to me in the course of business, and if called as a witness, I could and would competently testify thereto.

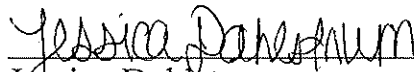
2. Patagonia has no stores, offices, or warehouses in the State of Arizona.

3. In order to receive promotional emails from Patagonia, a user must first sign up to receive such. A user will not receive promotional emails from Patagonia unless the user affirmatively signs up.

4. Once a user signs up to receive promotional emails from Patagonia, Patagonia will intermittently send promotional emails to the provided email address. Patagonia does not target anyone to sign up to receive promotional emails because they live in Arizona or have an Arizona address. Similarly, Patagonia does not direct promotional content to people who have signed up to receive promotional emails because of someone's Arizona address or residence.

5. Patagonia has been unable to locate any record in its customer database of a user by the name of Heather Knight who has registered to receive promotional emails and who has an address located in Arizona. Similarly, Patagonia has been unable to locate any sales data for a user by the name of Heather Knight who made a purchase with a billing or shipping address in Arizona during the relevant time period.

1 I declare under penalty of perjury under the laws of the United States of  
2 America that the foregoing is true and correct. Executed on this 7th day of August,  
3 2024, at Ventura, California.

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7 Jessica Dahlstrum  
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